



**2. DESCRIPTION AND LOCATION OF RELEVANT DOCUMENTS:**

The documents possessed by defendants relevant to its defenses in this lawsuit include the following:

1. Corporate Documents.
2. Documents for the equipment transfer from Jung Jin Corp and Asia Enterprises to KSK.
3. Federated States of Micronesia Loan Documents.
4. KSK Employee records.

**3. EXPERT WITNESSES:**

Defendants do not anticipate retaining any experts other than a translator.

**4. COMPUTATION OF DAMAGES:**

Defendants dispute the existence of any damages

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